DAMES & MOORE A PROFESSIONAL LIMITED PARTNERSHIP
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November 9, 1987

Chief, Site Investigation and Compliance Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

Attention: SCP - Carlstadt Project Officer

Dear Sir:

Attached is the October, 1987 Progress Report for RI/FS project at the SCP Carlstadt site. This report has been prepared by Dames & Moore, on behalf of the Committee representing the Respondents named in the Administrative Order on Consent No. II CERCLA-50114, in accordance with Paragraph 28B of the Order.

Very truly yours,

DAMES & MOORE

Gerard M. Coscia

Gerard M. Coscia, P.E.
Project Manager

GMC/jhm
Attachment

cc: Chief, Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
Room 437
26 Federal Plaza
New York, New York 10278

T. Armstrong
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ATTACHMENT 1

SCP RI/FS PROGRESS REPORT
OCTOBER 1987

PROGRESS AND STATUS

1. The laboratory data evaluation was completed on October 12.

2. A progress meeting was held on October 13 with the SCP Steering and Technical Committees to review the status of the laboratory test data. Based on the substantial deficiencies in the volatile and extractable fractions of the soil/sediment samples, the Technical Committee requested a complete re-sampling of the soil/sediment and re-analysis for all fractions. USEPA was notified of the re-sampling program on October 13 in a telephone call by Gerard Coscia of Dames & Moore.

3. Draft data summaries for soil/sediment samples and draft test reports for water samples were transmitted to the USEPA for review on October 21. The NJDEP was sent a similar package, excluding back-up documentation for the water samples.

4. Revision 4 to the Project Operations Plan (POP) was transmitted to the USEPA on October 26. The analytical parameter table was revised to enhance the analytical program for the re-sampling event, primarily by utilizing the most recent edition (third edition) of SW-846 for soil/sediment methodologies.

5. The second round of water sampling was scheduled for the week of November 23 in a telephone conversation on October 26 between Gerard Coscia of Dames & Moore and Janet Feldstein of the USEPA.

6. USEPA written approval of Revisions 2 and 3 to the POP had not been received as of October 31.

7. No comments on the geophysical data had been received from the USEPA by October 31.

TECHNICAL ISSUES

As noted in Item (2) above, the 52 soil/sediment samples (including three duplicates) will be re-collected and re-analyzed. The original soil/sediment laboratory data will not be used for site evaluations. The re-sampling will be performed at the same locations and depth intervals as the original soil/sediment samples. The USEPA has indicated that they will take the same number of split samples (approximately 40 percent) as they did during the original sampling.

The USEPA and NJDEP reviews of the original data are related to compliance with Applicable or Relevant and Appropriate Requirements (ARARs), which had not been previously required on this project. The effective date of the USEPA Interim Guidance Document (Directive Number 9234.0-05) was July 9, 1987. The compliance reviews could result in a revision to the laboratory analytical program to address lower Method Detection Limits (MDLs) and/or additional parameters. The USEPA has indicated that the second round of water sampling should proceed as scheduled in Item (5) above even if the compliance reviews are not completed by then, using the existing analytical program (as modified by Revision 4 to the POP).

Another issue related to the remedial investigation was identified by USEPA. According to the USEPA, a Natural Resource Damage Assessment (NRDA) may be required because the site is in a wildlife management area. The National Oceanic and Atmospheric Administration (NOAA) is the natural resource trustee for the area and has held preliminary discussions with USEPA regarding their data requirements. NOAA has advised USEPA that their biological toxicity levels for copper (2.9 ug/l) and silver (2.3 ug/l) are lower than the water MDLs in the POP (25 ug/l and 10 ug/l, respectively). Additionally, NOAA commented on the need for additional sediment and surface water sampling stations in Peach Island Creek. The USEPA will address the NRDA issues at a meeting with the Technical Committee.

A draft list of items for additional site work was transmitted to the Technical Committee on October 19. The list was based on discussions held at the October 13 progress meeting. In a conference call between Dames & Moore and the Technical Committee on October 29, a final list was developed and subsequently transmitted to the Steering Committee on October 30. The list is repeated below for completeness.

1. Install an upgradient monitor well screened in the till above the bedrock and collect a water sample for chemical analysis (to evaluate possible off-site contribution to the presence of chemical compounds in the lower aquifer).

2. Collect samples within the clay layer for chemical analysis at the new till well and at the three existing till wells (to evaluate potential chemical gradients through the clay layer).

3. Perform geotechnical testing (classification and permeability) on additional clay samples, including one duplicate permeability test using site ground water as the permeant (to evaluate characteristics of the clay layer and the influence on permeability of any organic compounds in the shallow ground water).

4. Collect air samples for chemical analysis (to evaluate air pathways and potential air toxics during performance of the endangerment assessment).

5. Develop and implement appropriate techniques for removing suspensions from split water samples for PCB analysis (to evaluate the amount of PCB in solution in the three shallow wells which exhibit PCB's).

6. Include field blanks in the Quality Assurance Program (to evaluate the contribution, if any, of the field equipment decontamination procedures to the presence of compounds in samples).

These items will be discussed with USEPA prior to developing implementation plans and budgets.

SCHEDULE

The RI phase of the project is currently 12 weeks behind schedule because of problems associated with the laboratory data. Further delays are expected because re-sampling is required and additional investigative work will be performed at the site. We recommend that the RI schedule be revised and extended to accommodate the re-sampling program and other additional field work.

PLANNED ACTIVITIES

1. Meet with USEPA on November 5 to review progress, discuss re-sampling and additional work, and receive USEPA comments.

2. Finalize re-sampling plans and develop plans for additional field work.

3. Collect the second round of water samples during the week of November 23.